REMARKS

Status Summary

In this amendment, no claims are added, and no claims are canceled. Therefore, upon entry of this Amendment, claims 1-40 will remain pending.

Drawings

In the Official Action, the drawings were objected to as failing to illustrate port 5060 as referenced on page 2, line 6 of the present specification. "5060" on page 2 at line 6 of the present specification refers to a transport layer (i.e., TCP or UDP) logical port at which SIP messages are received. As is well known in IP based networks, different communications protocols use different transport layer ports. For example, web traffic and email traffic use well-known ports so that machines in different locations can communicate with each other using the same ports. 5060 is the well-known port used for SIP traffic. 5060 on page 2 of the specification refers to the well-known port for SIP traffic and is not a reference numeral. Therefore, it is respectfully submitted that the objection to the drawings should be withdrawn.

Claim Objections

Claims 8, 12, 34, 35, and 37 were objected to as containing informalities. The claims have been amended as requested by the Examiner. Accordingly, it is respectfully submitted that the objection to these claims should now be withdrawn.

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Claim Rejections 35 U.S.C. § 112

Claim 13 was rejected under 35 U.S.C. § 112 as indefinite. Claim 13 has been amended to recite "an outgoing trunk group" in line 2. Accordingly, it is respectfully submitted that the rejection to claim 13 as indefinite should now be withdrawn.

Claim Rejections 35 U.S.C. § 102

Claims 1-5, 13, 20-24, and 38 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 2003/0158967 to Tripathi et al. (hereinafter, "Tripathi"). This rejection is respectfully traversed.

Independent claims 1 and 21 respectively recite a method and a SIP call processor for identifying an incoming SIP trunk group for a call and, based on the incoming SIP trunk group, for selecting per-trunk-group call processing data for the call. For example, claim 21 recites a SIP call processor that receives a SIP signaling message, such as an INVITE message, identifies an incoming trunk group for a new call, and selects, based on the incoming trunk group, per trunk group call processing data associated with different incoming trunk groups for processing the new call. As stated in the background section of Applicants' specification, one problem with IP telephony call processing is that unlike PSTN trunk groups where an incoming trunk group can be identified based on the trunk group over which a message is received, in SIP, all messages arrive over the same signaling interface. The subject matter of claims 1 and 21 solves this problem by identifying an incoming SIP trunk group associated with a call and selecting per trunk group call processing data for processing the call based on the incoming SIP trunk group.

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There is absolutely no teaching or suggestion in Tripathi of identifying an incoming SIP trunk group, not to mention electing per trunk group call processing data based on the incoming SIP trunk group. Rather than identifying an incoming SIP trunk group for a call and using the incoming SIP trunk group to select per trunk group call processing data, Tripathi discloses that a trunk group used for a call is identified based on the destination address for the call. For example, Tripathi states:

> At step **502**, an INVITE message is sent from the proxy to the resource manager. For example, the message may be addressed to "100.100.100.50:5060." At step **504**, the resource manager sends a reply message, for example "100", to the proxy. At this point, selection of the gateways may be based upon a preconfigured policy. For example, the decision may be "100.100.100.10:5060." (Emphasis added.) (See paragraph [0058] of Tripathi.)

From this passage and Figure 3A, Tripathi illustrates that the SIP gateway IP address to which a call is routed is selected based on the IP address and port that an INVITE message addressed to, i.e., 100.100.100.50:5060 in the example described above. For example, the above-quoted passage indicates that the destination address 100.100.100.50.5060 is mapped to 100.100.100.10.5060. In Figure 3A, row 308 maps the logical gateway transport address 100.100.100.50.5060 to a plurality of physical gateway address, including 100.100.100.10.5060. Thus, Tripathi discloses that a message addressed to a logical gateway address will be routed to one of a plurality of physical gateway addresses corresponding to the logical gateway address to which the message is addressed. Based on the foregoing, it is respectfully submitted that Tripathi discloses selecting a SIP gateway based on the destination address of a signaling message, rather than the incoming SIP trunk group, as claimed. Accordingly, for this reason alone, it is

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respectfully submitted that the rejection of claims 1-5, 13, 20-24, and 38 as anticipated by Tripathi should be withdrawn for this reason alone.

On page 3 of the Official Action, it is indicated that trunk group identification in Figure 3A of Tripathi discloses identifying an incoming SIP trunk group for a new call as claimed. Applicants respectfully disagree. In Figure 3A, trunk identification in column 1 of the table identifies a PSTN trunk, rather than a SIP trunk, and associates this trunk with a logical gateway transport address. In other words, according to Tripathi multiple PSTN trunks may be grouped together and associated with a logical address corresponding to one or more gateways. Nothing about Figure 3A teaches identifying an incoming SIP trunk group. Moreover, as stated above, SIP call routing according to Tripathi is performed based on the destination address in a message rather than the incoming SIP trunk group. Accordingly, for this additional reason, it is respectfully submitted that the rejection of claims 1-5, 13, 20-24, and 38 as anticipated by Tripathi should be withdrawn.

Claim Rejections 35 U.S.C. 103

Claims 6-12, 14-19, 25-36, and 39-40 were rejected under 35 U.S.C. § 103(a) as unpatentable over Tripathi. This rejection is respectfully traversed.

Claims 6-12 and 14-19 depend from claim 1. Claims 25-36, 39, and 40 depend from claim 21. As stated above with regard to the rejection of independent claims 1 and 21, Tripathi fails to teach or even remotely suggest identifying an incoming SIP trunk group associated with a call, not to mention using the incoming SIP trunk group to select per trunk group call processing data. In contrast, Tripathi discloses that the SIP gateway to which a call is assigned is based on the destination address in a received INVITE

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message. Accordingly, it is respectfully submitted that the rejection of claims 6-12, 14-19, 25-36, and 39-40 as unpatentable over Tripathi should be withdrawn.

Claim 37 was rejected under 35 U.S.C. § 103(a) as unpatentable over Tripathi in view of U.S. Patent Publication No. 2004/0121814 to Creamer et al. (hereinafter, "Creamer"). This rejection is respectfully traversed.

Claim 37 depends from claim 21. As stated above with regard to the rejection of claim 21 based on Tripathi, Tripathi fails to teach or even remotely suggest identifying an incoming SIP trunk group associated with a call or using the incoming SIP trunk group to select per trunk group call processing data for the call. In contrast, Tripathi discloses that for SIP originated calls, the destination address in the INVITE message is used to route the call. Creamer likewise fails to teach or suggest identifying an incoming SIP trunk group for the call or using the incoming trunk group to select per trunk group call processing data. Creamer is directed to a graphical user interface for viewing different options offered by an interactive voice response server of a call center. There is absolutely no teaching or suggestion of identifying an incoming SIP trunk group or using the incoming SIP trunk group to select per trunk group call processing data. Accordingly, it is respectfully submitted that the rejection of claim 37 as unpatentable over Tripathi in view of Creamer should be withdrawn.

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DEPOSIT ACCOUNT

The Commissioner is hereby authorized to charge any fees associated with the filing

of this correspondence to Deposit Account No. <u>50-0426</u>.

Respectfully submitted,

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Date: <u>August 15, 2005</u>   By: _____

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